

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

GILBERTO GONZALEZ CRUZ
YVETTE MARTINEZ SANCHEZ

DEBTORS

CASE NO 18-04884 MCF

CHAPTER 13

**DEBTORS' REPLY TO TRUSTEE'S OBJECTION TO PROPOSED
PLAN CONFIRMATION UNDER SECTION 1325
DOCKET NO. 21**

TO THE HONORABLE COURT:

COMES NOW, GILBERTO GONZALEZ CRUZ and YVETTE MARTINEZ SANCHEZ, the Debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. The Chapter 13 Trustee filed an unfavorable report on confirmation (Docket No. 21) of the Debtors' proposed Amended Chapter 13 Plan, Docket no. 19, basically stating that the proposed Plan has a mathematical failure since there is an error in the base of the Plan.

2. That the Debtors hereby reply to the Trustee respectfully stating as that on 12/11/2018 the Debtors filed an Amended Chapter 13 Plan, dated December 11, 2018, which Plan cures the mathematical failure in the proposed Plan base, as stated by the Chapter 13 Trustee in his "unfavorable report", at Docket No. 21.

4. The Debtors are up-to-date in the Plan payments to the Trustee.

5. Based on the aforementioned, the Debtors pray this Honorable Court grant the present motion in reply to the Trustee's unfavorable report on confirmation, Docket No. 21, in the above captioned case.

WHEREFORE the Debtors respectfully pray that the Trustee's unfavorable recommendation on confirmation (Docket No. 21), be denied.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send

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Reply to Trustee's Unfavorable Report
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notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by regular US mail a copy of this motion to the following participant: Debtors, Gilberto Gonzalez Cruz and Yvette Martinez Sanchez, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 11th day of December, 2018.

/s/ Roberto Figueroa Carrasquillo
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